

Q6: How does an MRW facility comply with the Universal Waste Rule?

A6: Moderate Risk Waste (MRW) collection facilities can collect Universal Waste if they comply with the provisions for Universal Waste Handlers under the Dangerous Waste Rule, WAC 173-303-573.

A Universal Waste Handler can accept Universal Waste from any of the three different generator classes:

- 1) Conditionally Exempt Small Quantity Generators (CESQGs) if they say that they want to have any of their MRW managed as Universal Waste,
 - 2) Medium Quantity Generators (MQGs), or
 - 3) Large Quantity Generators (LQGs)
- according to definition of “universal waste handler” in WAC 173-303-040.

Household Hazardous Waste (HHW) is categorically exempt from the Universal Waste part of the Dangerous Waste Rule. CESQGs have two options. They can either direct a facility to manage the waste as Universal Waste or manage it in accordance with CESQG regulations. However, if MRW (HHW or CESQG waste not intended for handling as Universal Waste) is mixed with Universal Waste it loses its exemption and becomes subject to the Universal Waste part of the Dangerous Waste Rule. Consequently, it is recommended that you store all Universal Wastes in separate containers and areas from MRW. In addition, treatment of lamps, such as crushing, or accumulation for disposal by Universal Waste Handlers subject a facility to full regulation under the Dangerous Waste Regulations, WAC 173-303.

There are accumulation quantities of Universal Waste which determine your status as a Small or Large Quantity Handler of Universal Waste, and these differ by waste type. The three waste types are batteries (excluding spent lead-acid batteries), mercury-containing thermostats, and universal waste lamps (typically for designation for mercury and/or lead). If you collect 2,200 pounds or more of universal waste lamps or 11,000 pounds or more of all universal waste types (including the 2,200 pound allowance for lamps) you are considered to be a Large Quantity Handler of Universal Waste (LQHUV). If you are always below these Universal Waste accumulation quantity thresholds the facility is considered a Small Quantity Handler of Universal Waste (SQHUV).

The regulations applicable to Small versus Large Quantity Universal Waste Handlers are similar. The Large Quantity Handlers of Universal Waste have additional requirements to:

- 1) notify the Dept. of Ecology,
- 2) ensure employee training, and
- 3) keep records of shipments for three years.

The notification currently is by using [Form 2](#) available at <http://www.ecy.wa.gov/biblio/9128.html>. This will be replaced in the future by the Site ID Form. Look for it on the [Hazardous Waste and Toxic Reduction Program publications](#) site.

There are additional requirements for waste management of both Small and Large Quantity Handlers of Universal Wastes, which include management of containers, labeling, response to releases and disposal prohibitions.

For more information about the requirements for Universal Waste Handlers see the following publications:

[Universal Waste Rule for Batteries and Mercury-Containing Thermostats](#) and [Universal Waste Rule for Dangerous Waste Lamps](#).